

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)	
)	
ASHLEY MARIE GJOVIK,)	CHAPTER 7
)	CASE NO. 25-11496-CJP
Debtor)	

**CHAPTER 7 TRUSTEE’S APPLICATION FOR AUTHORITY TO
EMPLOY VERDOLINO & LOWEY, P.C. AS ACCOUNTANTS TO TRUSTEE**

Mark G. DeGiacomo, the duly appointed Chapter 7 Trustee for the bankruptcy estate of the above-captioned Debtor (the “Trustee”) hereby requests, pursuant to 11 U.S.C. Section 327(a) and Bankruptcy Rule 2014(a), that this Court enter an Order allowing the employment of Verdolino & Lowey, P.C. (the “Accountants”), as Trustee’s Accountants. In support of this Motion, the Trustee submits the Signed Statement of Matthew R. Flynn, CPA, CFF, CIRA in Support of Application for Employment Pursuant to Bankruptcy Rule 2014(a) and Local Rule 2014-1 attached hereto as Exhibit A.

In further support of this Motion, the Trustee states as follows:

1. On July 21, 2025, Ashley Marie Gjovik (the “Debtor”) filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code.
2. On July 22, 2025, the Trustee was appointed as the Chapter 7 Trustee of this bankruptcy estate.
3. The Trustee intends to retain the Accountants to perform estate work pursuant to the following rate schedule:

Principals:	\$565.00 /hr.
Managers:	\$275.00 - \$450.00 /hr.
Staff:	\$225.00 - \$395.00 /hr.

Bookkeepers \$225.00 - \$300.00 /hr.

Clerical: \$95.00 /hr.

4. An appropriate fee application shall be submitted to the Bankruptcy Court after services are rendered, and the compensation shall be subject to review by the Court.

5. The Trustee finds it necessary to employ the Accountants to perform services for the estate, including, but not limited to:

- a. to prepare and file on behalf of the estate all necessary tax returns that may be required by federal, state or local law;
- b. to advise the Trustee regarding the tax implications of asset recovery;
- c. to advise and assist the Trustee with respect to evaluating and objecting to proofs of claim submitted by federal and state taxing authorities;
- d. to assist the Trustee in reviewing and examining the books and records of the Debtor with respect to potential preference and/or fraudulent conveyance or transfer claims; and to assist the Trustee with other tasks that the Trustee may require and reasonably request.

6. To the best of the Trustee's knowledge, the Accountants as proposed herein do not represent any interest adverse to the estate in matters upon which the Accountants are to be employed and are disinterested persons as to that term as defined in 11 U.S.C. Section 101(14) as it applies to 11 U.S.C. Section 327(a).

7. The Accountants have performed similar bankruptcy related services on previous occasions and therefore are familiar with the process involved in doing work for estates in bankruptcy.

8. The Trustee believes that the employment of the Accountants is in the best interest of the estate.

WHEREFORE, the Trustee respectfully requests this honorable Court enter an order pursuant to the provisions of 11 U.S.C. Section 327(a) authorizing the Trustee to employ Matthew R. Flynn, CPA, CFF, CIRA and Verdolino & Lowey, P.C. to act as Accountants for the Trustee for bankruptcy related matters and to perform the professional services specified herein, including but not limited to any and all accounting services which may be required during the course of this case.

Respectfully submitted,
MARK G. DEGIACOMO, CHAPTER 7
TRUSTEE OF THE ESTATE OF
ASHLEY MARIE GJOVIK

/s/ Mark G. DeGiacomo
Mark G. DeGiacomo, Esq. BBO #118170
Harris Beach Murtha Cullina PLLC
33 Arch Street, 12th Floor
Boston, MA 02110
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617-482-3868 Facsimile
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Dated: August 15, 2025

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re:)	
)	
ASHLEY MARIE GJOVIK,)	Chapter 7
)	Case No 25-11496-CJP
Debtor.)	
)	

SIGNED STATEMENT OF MATTHEW R. FLYNN, CPA, CFF, CIRA
IN SUPPORT OF APPLICATION FOR EMPLOYMENT PURSUANT
TO BANKRUPTCY RULE 2014(a) AND LOCAL RULE 2014-1

I, Matthew R. Flynn, being duly sworn, do hereby depose and state as follows:

1. I am a Certified Public Accountant, Certified in Financial Forensics, a Certified Insolvency and Restructuring Advisor, and a Managing Director of Verdolino & Lowey, P.C. (the "Firm"), whose office is located at 124 Washington Street, Foxborough, Massachusetts. I am generally familiar with the business of the Firm and have made inquiry concerning the facts set forth herein prior to making this Affidavit.

2. I hereby represent that neither I nor any member of my Firm holds or represents any interest adverse to the estate of the above-named Debtor.

3. My and my Firm's connection with the Debtor, any creditor, or other party of interest, their respective attorneys and accountants are as follows:

(a) My Firm represents Mark G. DeGiacomo, Esq.

("DeGiacomo"), the Chapter 7 Trustee in this case, in his capacity as Chapter 7 and 11 Trustee in many other wholly unrelated matters including but not limited to: Boston's Children's Theatre, Inc. (Case No. 19-14093-MSH); LeadingSide, Inc. (Case No. 01-12876-MSH); Walger, Inc. (Case No. 19-10956-MSH); W.L.E.J., Inc. (Case No. 19-10955-MSH); Boonstle, Inc. (Case No. 19-14405-JEB); Donna M. Foster-Sawtelle (Case No. 19-14331-MSH); The Parker Company, Ltd. (Case No. 20-10973-MSH); Jeffrey R. Leiter and Caitlin M. Jewell (Case No. 20-10232-FJB); Rania L. Ibrahim (Case No. 20-10527-MSH); Straight Up Development, LLC (Case No. 20-10606-FJB); Kentucky Beverage Co., Inc. (Case No. 20-11518-JEB); James A. Cambece, Jr. (Case No. 19-11698-MSH); BioChemics, Inc. (Case No. 12-12324-MLW); Anna Kozaczka (Case No. 20-10481-JEB); Benjamin F. T. Kechley (Case No. 20-10974-MSH); Jean N. Chery (Case No. 20-12034-FJB); Patricia Pierce Fitzgerald (Case No. 19-12051-JEB); Gohar J Adam Khan (Case No. 20-12266-JEB); Harutjun and Yegisabet E. Dermendjian (Case No. 21-10077-MSH); Expert Contractors, Inc. (Case No. 21-10635-FJB); Etoze Harabalja (Case No. 21-10810-FJB); Ser-vil Cab, Inc. (Case No. 21-10602-FJB); Tilo J. Ricci (Case No. 21-10932-FJB); Arlington

Health & Fitness, LLC (Case No. 21-11064-CJP); Charles Herbert Gifford, III, (Case No. 21-11775-FJB); Johnson Building & Construction, Inc. (Case No. 21-11376-JEB); BRG Restaurant Mgmt. LL (Case No. 21-11930-JEB); Pierre H. Joujoute (Case No. 22-10775-FJB); Boris Eydinoy (Case No. 22-10182-JEB); Rafael Arroyo (Case No. 22-10458-CJP) Jian Hua Zhang (Case No. 22-10443-JEB); Trans-Analysis, Inc. (Case No. 21-10866-JEB); Stephen J. Galuna (Case No. 22-11312-CJP); Stephanie Catherine Smith (Case No. 23-10591-CJP); James A. Cambece, Jr. (Case No. 19-11698-JEB); Laina V. Rigos (Case No. 23-10978-JEB); New Ming, Inc. (Case No. 23-10823-JEB); Shengyuan Yang (Case No. 23-11019-JEB); Joseph T. McDonough, III, and Kelly A. McDonough (Case No. 23-11080-CJP); Dawn, E. McMahon (Case No. 23-11189-CJP); Belinda K. Jentz (Case No. 23-10843-CJP); Nantasket Management, LLC (Case No. 23-11272-JEB)); Lawrence Joseph McNeil (Case No. 20-10807-JEB); 5Linx Holdings, Inc. (Case No. 23-11886); Dorothy L. and Gerard R. Reardon (Case No. 23-11888-JEB); Neville E. Ross, (Case No. 23-12126-CJP); Jessica Taige (Case No. 23-12124-CJP); Sabrina Marie Wadhams (Case No. 23-12186-JEB); ViviSource Laboratories, Inc. (Case No. 12-18788-JEB); Design Pharmaceuticals, Inc. (Case No. 24-11350-JEB); L&L Wholesale Homes (Case No. 23-11630-

JEB); West Harwich Holdings, LLC (Case No. 24-11294-JEB); Scharn Industries, LLC (Case No. 23-10298-JEB); Samuel Peter Spina (Case No. 24-11660-JEB); Simeon L. Corbin (Case No. 24-11676-CJP); Luke M. Collins (Case No. 24-11349-CJP); Stephen Buckley (Case No. 24-11636-JEB); LJB LLC (Case No. 24-12236-JEB); Crystle M. Salamone (Case No. 25-10473-CJP); Dana F. Greene (Case No. 25-10083-JEB); Freight Farms, Inc (Case No. 25-10908-CJP); Freedom Wind Tunnel, LLC (Case No. 24-10082-CJP); J&B Food Services, LLC (Case No. 25-10844-JEB); Stephanie R. O'Rourke (Case No. 25-10856-CJP).

- (b) My firm represents Olga L. Gordon, Esq. ("Gordon") in her capacity as Chapter 7 Trustee in other wholly unrelated matters including, but not limited to:
- Packard Logging and Chipping, LLC (Case No. 19-10160-BAH); Keith Sohaib Siddiqui (Case No. 19-11284-BAH); Andrea M. Bishop (Case No. 19-11285-BAH); Fruitful Enterprises, LLC (Case No. 19-11610-BAH); Suren and Lisa Donabedian (Case No. 19-10333-BAH); Gregory S. Surprise (Case No. 19-10900-BAH); John Caliri (Case No. 19-11286-BAH); Poolscape, LLC (Case No. 20-10773-BAH); Sue Ellen Weed-Parkes and Robert Gerard Parkes (Case No. 19-11062-BAH); New Hampshire Land Investment Company, LLC (Case No. 20-10721-BAH); Judy Cartier (Case No. 20-10885-BAH); Veracity Construction Group,

Inc. (Case No. 20-11037-BAH); Christina M. Vielmas
(Case No. 20-10875-BAH); Robert C. Cimon, Jr. (Case
No. 20-11038-BAH); Parrillo Designs, LLC (Case No. 21-
10020-BAH); David A. Herlicka (Case No. 19-11247-BAH);
EyeCor Construction, LLC (Case No. 21-10591-BAH);
Corbell Development, LLC (Case No. 21-10592-BAH);
Daniel James Buck (Case No. 21-10303-BAH); Stanley P.
and Linda L. Cholewa (Case No. 19-10685-BAH); Jacques
Hevelt (Case No. 20-10409-BAH); Adel and Gabrielle
Juma (Case No. 21-10063-BAH); Elliott and Sally Baker
(Case No. 21-10715-BAH); J. Hunter Properties, LLC
(Case No. 22-10025-BAH); Robert H. Enderson (Case No.
22-10275-BAH); Thomas Adams (Case No. 22-10260-BAH);
James W. Kennedy III (Case No. 22-10116-BAH); Deborah
Saucier (Case No. 21-10374-BAH); David & Tammy
Carnevale (Case No. 22-10406-BAH); Brenda Carlson
(Case No. 22-10034-BAH); Dennis J. Laroche (Case No.
19-11042-BAH); Michael Boisvert (Case No. 22-10514-
BAH); Breakaway Beerworks, LLC (Case No. 22-10657-
BAH); Scott A. & Mary A. Launsby (Case No. 22-10654-
BAH)Gregory N. Ball (Case No. 22-10593-BAH); Joshua R.
Dore (Case No. 22-10633-BAH); David G. Kamen PHD, PC
(Case No. 23-10080-BAH); Jacob Randall Lyons (Case No.
23-10381-BAH); James Christopher Bray (Case No. 23-
10714-BAH); Novi Antik Design, LLC (Case No. 24-10080-

BAH); Andrew Gettis and Mariana Moreno-Gettis (Case No. 24-10177-BAH) Capital City Paving, Inc. (Case No. 24-10191-BAH) Friends of Coastal Waters (Case No. 24-10219-BAH); Dale R. Barber (Case No. 24-10109-BAH); Revolving Market, LLC (Case No. 24-10285-BAH); John Bradford Regan, III (Case No. 24-10164-KB); Douglas Edwin Clark (Case No. 24-10079-KB); David A. Thompson (Case No. 23-10426); Milton L. Marder (Case No. 01-13405-MAF); Lisa C. Berman and Jay Berman (Case No. 15-11512-KB); Brandon Pike (Case No. 24-10404-KB); Ryan Bakis (Case No. 24-10569-KB); Guy Patrick Sawyer and Margaret Louise Sawyer (Case No. 24-10588-KB); Cate Street Capital, Inc. (Case No. 20-10506-KB); Quick Serve, LLC (Case No. 24-10518-KB); Sand Castle Construction and Hardscape, LLC (Case No. 24-10460-KB); MSI Global Talent Solutions, LLC (Case No. 25-10098-KB); Winner's Circle Auto Sale, LLC (Case No. 24-10680-KB); HPL, LLC (Case No. 24-10686-KB); David Valicenti (Case No. 25-10087-KB); Miguel DeJesus and Erica DeJesus (Case No. 24-10636-KB).

- (c) DeGiacomo and Gordon are Partners of Harris Beach Murtha Cullina, PLLC ("HBMC"). HBMC represents various parties of interest in many wholly unrelated bankruptcy cases in which the Firm and its employees are employed including, but not limited to: National

Fish and Seafood Inc. (Case No. 19-11824-FJB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Karen Maria Trawling Co. (Case No. 19-12501-FJB) where HBMC represents an Interested Party and the Firm is the Trustee's Accountant; Legacy Global Sports, LLP (Case No. 20-11157-JEB) where HBMC represents the Debtor and the Firm is the Trustee's Accountant; Pro Star Electric, Inc. (Case No. 19-14178-FJB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; The Paper Store, LLC (Case No. 20-40743-CJP) where HBMC represents a creditor and the Firm is the Trustee's Accountant; Charles Herbert Gifford, III (Case No. 21-11775-FJB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Pierre H. Joujoute (Case No. 22-10075-CJP) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; North East Freightways, LLC (Case No. 22-10992-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Edition Logistics Management, LLC (Case No. 22-10990-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Precision Delivery Solutions, LLC (Case No. 22-10991-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; New York Express and Logistics,

LLC (Case No. 22-10993-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; DHLNH, LLC (Case No. 22-10994-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; LAX, LLC (Case No. 22-10995-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; The Nash Engineering Company (Case No. 21-50644-JAM) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; J. Hunter Properties, LLC (Case No. 22-10025-BAH) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; James A. Cambece, Jr. (Case No. 19-11698-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; David G. Kamen PHD P.C. where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Lexagene Inc. where HBMC represents the Debtor and the Firm is the Trustee's Accountant; Justin E. Valanzola (Case No. 23-10142-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Cyteria A. Nicks (Case No. 23-10243-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Novi Antik Design, LLC (Case No. 24-10080-BAH) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Capital City Paving, Inc. (Case

No. 24-10191-BAH) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Twentyfirst Century Biochemicals, Inc. (Case No. 24-40446-EDK) where HBMC represents the Debtor and the Firm is the Trustee's Accountant; Boston Center for Ambulatory Surgery, Inc. (Case No. 24-10406-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Patrick Michael O'Keefe (Case No. 24-10132-KB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Douglas Edwin Clark (case No. 24-10079-KB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Frank J. Cotrona Jr., (Case No. 23-30539-AMN) where HBMC represents a creditor and the Firm is the Trustee's Accountant; Brandon Pike (Case No. 24-10404-KB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Jung Hua (Case No. 20-12416-CJP) where HBMC represents a creditor and the Firm is the Trustee's Accountant; Jason M. Kahan (Case No. 24-11592-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; C.W. Keller & Associates, LLC and C.W. Keller Holding Company, Inc., (Case No. 23-11357-CJP) where HBMC represents an interested party and a partner of the Firm is the Post Confirmation Trustee and the Firm is his Accountant;

Compass Medical P.C. (Case No. 23-10556-CJP) where HBMC represents a creditor and the Firm is the Trustee's Accountant; LJB LLC (Case No. 24-12236-JEB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; HPL, LLC (Case No. 24-10686-KB) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant; Laura Patricia Heras (Case No. 21-11005-CJP) where HBMC is Counsel to the Trustee and the Firm is the Trustee's Accountant.

4. I hereby represent that I have agreed not to share with any persons the compensation to be paid for the accounting services rendered in this case, except with the Firm.


5. Neither I nor my Firm has received a retainer in connection with this matter.

6. I shall amend this statement immediately upon my learning that (a) any of the within representations are incorrect or (b) there is any change of circumstance relating thereto.

7. I have reviewed the provisions of MLBR 2016(a)(1) of the Local Rules of Bankruptcy Procedure for this District.

8. Notwithstanding the foregoing, I hereby represent that I and each member of my Firm are "disinterested persons" as that term is defined in 11 U.S.C. Sec. 101(14).

Signed under the pains and penalties of perjury this 14th day of August 2025.

A handwritten signature in black ink, appearing to read 'Matthew R. Flynn', is written over a horizontal line.

Matthew R. Flynn, CPA, CFF, CIRA
Verdolino & Lowey, P.C.
124 Washington Street
Suite # 101
Foxboro, MA 02035
(508) 543-1720



VERDOLINO & LOWEY, P.C., Certified Public Accountants

Professional Rates (Hourly)

- Principals \$565.00
- Managers \$275.00 - \$450.00
- Staff \$225.00 - \$395.00
- Bookkeepers \$225.00 - \$300.00
- Clerical \$95.00

On January 1st of each year, the Firm reviews and adjusts the hourly rates of all employees. These rates will be in effect until December 31, 2025.

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

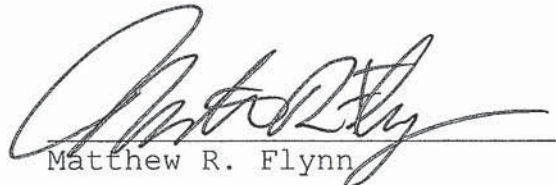
In re:)	
)	
ASHLEY MARIE GJOVIK,)	Chapter 7
)	Case No 25-11496-CJP
Debtor.)	
)	

DECLARATION RE: ELECTRONIC FILING

I, Matthew R. Flynn, hereby declare under penalty of perjury that all of the information contained in my Signed Statement Of Matthew R. Flynn, In Support Of Application For Employment Pursuant To Bankruptcy Rule 2014(A) And Local Rule 2014-1 (the "Document"), filed electronically, is true and correct. I understand that this DECLARATION is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this DECLARATION may cause the Document to be struck and any request contained or relying therein to be denied, without further notice.

I further understand that pursuant to the Massachusetts Electronic Filing Local Rule (MEFR)-7(b) all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Executed this 14th day of August 2025.


Matthew R. Flynn

FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)	
)	
ASHLEY MARIE GJOVIK,)	CHAPTER 7
)	CASE NO. 25-11496-CJP
Debtor)	

CERTIFICATE OF SERVICE

I, Mark G. DeGiacomo, hereby certify that on the 15th day of August, 2025, I served a copy of the *Chapter 7 Trustee's Application for Authority to Employ Verdolino & Lowey, P.C. as Accountants to Trustee* and *Signed Statement of Matthew R. Flynn, CPA, CFF, CIRA In Support of Application for Employment*, via first-class mail, postage prepaid, ECF transmission or by electronic mail upon the parties listed on the attached Service List.

/s/ Mark G. DeGiacomo
Mark G. DeGiacomo, Esq. BBO #118170
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33 Arch Street, 12th Floor
Boston, MA 02110
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Richard King, Asst. U.S. Trustee*
Office of the US Trustee
J.W. McCormack P.O. & Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Ashley Marie Gjovik
18 Worcester Square, Apt. 1
Boston, MA 02118

Aidvantage- U.S. Department of
Education
Attention: Bankruptcy Discharge
P.O. Box 9635
Wilkes-Barre, PA 18773

Apple Inc
Attention; Apple Payment Services
10355 N. De Anza Blvd
Cupertino, CA 95014

Bank of America
Attention; Billing/Insolvency
PO Box 672050
Dallas, TX 75267

Boston Medical
Attention: Billing/Insolvency
One Boston Medical Center Place
Boston, MA 02118

Goldman Sachs Bank USA
Salt Lake City Branch
Lockbox 6112, P.O. Box 7247
Philadelphia, PA 19170

JPMorgan Chase Bank, N.A.
Mail Code LA4-7100
Monroe, LA 71203

Tremont Dental Care
Attention: Billing/Insolvency
635 Tremont St.
Boston, MA 02118

U.S. Department of Education
Attention: Bankruptcy Discharge
400 Maryland Avenue, SW
Washington, DC 20202

****served by ECF transmission***